

EXHIBIT

E

Declaration of Peter C. Salerno
In Opposition to Plaintiffs' Motion to Compel
Against Yassin Abdullah Kadi

03 MDL 1570

January 2018



Peter Salerno <peter.salerno.law@gmail.com>

03 MDL 1570 - Kadi

1 message

Peter Salerno <peter.salerno.law@gmail.com>

Wed, Jun 10, 2015 at 2:57 PM

To: "WTC[amaloney@kreindler.com]" <amaloney@kreindler.com>

Cc: jerry goldman <jgoldman@andersonkill.com>, "Carter, Sean" <scarter1@cozen.com>, "Tarbutton, J. Scott" <starbutton@cozen.com>, R Haefele <rhaefele@motleyrice.com>, "WTC[jkreindler@kreindler.com]" <jkreindler@kreindler.com>, Amy Rothstein <amyrothsteinlaw@gmail.com>

We are working on a response to your May 6 letter. In addition, our client has agreed to make a substantial additional production that we believe will address with all or most of the issues raised in that letter, and will include many documents responsive to your second document request. We believe that our prior production, completed on December 15, 2014, included all documents that were relevant and responsive to the plaintiffs' document requests, and within the scope of the limited jurisdictional discovery allowed as to Mr. Kadi. In your May 6 letter, you identify certain additional categories of documents that you assert should have been produced. Although we do not necessarily agree that those additional categories are within the scope of the document requests, or are otherwise relevant to addressing personal jurisdiction over Mr. Kadi, we are producing them in a good-faith effort to resolve any remaining concerns that plaintiffs may have. We cannot yet estimate how long this process will take because our client is attempting to locate additional documents, and we do not know either the volume of relevant documents that might be located or how long it may take to locate them to the extent that they are not in his immediate possession. If you have any questions, please do not hesitate to let us know.

Regards, Peter

Peter C. Salerno
Salerno & Rothstein
221 Schultz Hill Road
Pine Plains, NY 12567
T: [518.771.3050](tel:518.771.3050)
M: [917.282.8429](tel:917.282.8429)
F: [866.589.9010](tel:866.589.9010)
E: peter.salerno.law@gmail.com
URL: www.salernorothstein.com